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December 17, 2019

Via ECF Only

New Jersey Federal District Court

Attn: Honorable John Michael Vazquez

50 Walnut Street

Newark, NJ 07102

Re: USA v. Daniel Dxrams

Crim No.: 18-379 (JMV)

Dear Judge Vazquez:

Please accept this letter on behalf of our client, Daniel Dxrams, with regard to our currently pending motion. Specifically, pursuant to Your Honor's permission to file a supplemental submission as to the timeliness of the motion which will be heard on the merits, the undersigned submits that the rule should be relaxed given the circumstances.

As the parties discussed in the telephone conference, thought the undersigned had requested and obtained what I believed to be the consent of the Government, the passing of the Honorable William Walls was an extenuating circumstance which should be taken into consideration.

I sincerely appreciate the court hearing this matter on the merits on short notice. In the event that the Government or Your Honor requires additional time to address the motions in a manner that will allow Mr. Moscato to argue them prior to his departure at the end of this year I will consent to any day or time that is convenient.

Sincerely,

Michael Orozco

MAO/mao

cc: All Counsel (Via ECF)

